

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
RAYMOND LYDELL SPELLER	:	VIOLATION:
	:	18 U.S.C. § 922(g)(1) and 924(e) (felon in
	:	possession of a firearm - 1 count)
	:	Notice of prior convictions
	:	Notice of additional factors
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about February 10, 2004, at Lancaster City, in the Eastern District of
Pennsylvania, defendant

RAYMOND LYDELL SPELLER,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable
by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate
and foreign commerce a firearm, that is, a Taurus International, Model PT92 AFS, 9mm pistol,
serial number TWD63761, loaded with 8 live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF PRIOR CONVICTIONS

THE GRAND JURY FURTHER CHARGES THAT:

Defendant **RAYMOND LYDELL SPELLER** committed the offense charged in Count One of this indictment after having been convicted in a court of the Commonwealth of Pennsylvania of three serious drug offenses and one violent felony as follows:

- (1) Possession with intent to deliver cocaine (F)
(C.P. Lancaster County. 4004CR1998),
- (2) Possession with intent to deliver cocaine (F)
(C.P. Lancaster County. 3924CR1999),
- (3) Possession with intent to deliver cocaine (F)
(C.P. Lancaster County. 4587CR1999), and
- (4) Criminal Conspiracy to commit aggravated assault (F1)
(C.P. Lancaster County. 2423CR2000).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

In committing the offense charged in Count One of this indictment,
defendant **RAYMOND LYDELL SPELLER:**

- a. Committed the instant offense subsequent to sustaining at least two felony convictions of either a crime of violence or a controlled substance offense, as defined by U.S.S.G. §2K2.1(a)(2), Application Note 5.
- b. Committed the instant offense while under a criminal justice sentence, that is, probation, as defined by U.S.S.G. § 4A1.1(d).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Sections 922(g) as set forth in Count One of this Indictment, the defendant

RAYMOND LYDELL SPELLER

shall forfeit to the United States of America, all firearms and ammunition involved in the commission of this offense, including, but not limited to:

(a). a Taurus International, Model PT92 AFS, 9mm pistol, serial number TWD63761, loaded with 8 live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney